

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF OKLAHOMA**

(1) REDBIRD BUSINESS GROUP, LLC, )  
(2) REDBIRD BIOSCIENCE OKLAHOMA, )  
    LLC, )  
(3) RB REALTYCO, LLC, )  
                )  
Plaintiffs,                          )  
                )  
v.                                     ) Case No. 20-cv-00098-JAR  
                )  
(1) MATTHEW HARRISON,             )  
                )  
Defendant-Counterclaim            )  
Plaintiff.                         )

**JUDGMENT CREDITOR MATTHEW HARRISON'S APPLICATION  
FOR ORDER TO JUDGMENT DEBTOR REDBIRD BUSINESS GROUP LLC  
TO APPEAR AND DISCLOSE PROPERTY**

R. Trent Shores, OBA No. 19705  
Adam C. Doverspike, OBA No. 22548  
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*Attorney for Judgment Creditor  
Matthew Harrison*

Date: April 30, 2024

Judgment Creditor Matthew Harrison moves the Court for an order to Judgment Debtor Redbird Business Group LLC (“Judgment Debtor”) to appear and disclose property, pursuant to 12 O.S. § 842(A). In support of this application, Plaintiffs state as follows:

1. On March 27, 2024, this Court entered the *Amended Judgment* in favor of Defendant / Counterclaim Plaintiff Matthew Harrison and against Plaintiffs Redbird Business Group, LLC; Redbird Bioscience Oklahoma LLC, and RB RealtyCo LLC in the amount of \$437,500. See Dkt. #199.
2. On March 27, 2024, the Court awarded \$100,078.13 in prejudgment interest to Defendant / Counterclaim Plaintiff Matthew Harrison and against Plaintiffs Redbird Business Group, LLC; Redbird Bioscience Oklahoma LLC, and RB RealtyCo LLC. Dkt. #200.
3. On March 27, 2024, the Court awarded \$7,889.95 in costs to Defendant / Counterclaim Plaintiff Matthew Harrison and against Plaintiffs Redbird Business Group, LLC; Redbird Bioscience Oklahoma LLC, and RB RealtyCo LLC. See Dkt. #201.
4. On March 28, 2024, the Court awarded \$1,212,552 for attorney fees to Defendant / Counterclaim Plaintiff Matthew Harrison and against Plaintiffs Redbird Business Group, LLC; Redbird Bioscience Oklahoma LLC, and RB RealtyCo LLC. See Dkt. #202
5. As of March 28, 2024, Judgment Debtor was indebted to Matthew Harrison for \$1,758,030.08, plus post-judgment interest at the rate of 5.02% from March 27, 2024, until all amounts owed under the Amended Judgment are paid in full.
6. To date, no sums have been paid by the Judgment Debtor to Matthew Harrison on account of the Amended Judgment.

7. Plaintiffs now seek an order for Judgment Debtor to appear at an asset hearing and produce records concerning its assets.

8. Plaintiffs request that Judgment Debtor identify or produce each item listed on **Exhibit “A”** of this Application, and any other relevant documentation of assets at least 10 days before the asset hearing to Matthew Harrison’s undersigned counsel.

**WHEREFORE**, Judgment Creditor Matthew Harrison prays that the Court enter an Order: (i) requiring Redbird Business Group LLC to appear before the Court, at a time and place specified in such order, to answer concerning its property, and to identify or produce each item listed on **Ex. “A”** for purposes of same; (ii) enjoining Redbird Business Group LLC from alienating, concealing, or encumbering any of its nonexempt property pending the hearing and further order of the Court, and (iii) granting such further and other relief in favor of Judgment Creditor as it may deem just and proper.

**DATED** this 30th day of April 2024.

*/s/ Adam C. Doverspike*

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**ATTORNEYS FOR JUDGMENT CREDITOR**  
**MATTHEW HARRISON**

**EXHIBIT "A"**

1. Identify each account held at a financial, investment, or banking institution of any kind in which Redbird Business Group LLC<sup>1</sup> has any legal or equitable right, title or interest (including as beneficiary of any trust), which Redbird Business Group LLC controlled, for which it had signatory authority at any time, or into which it placed any funds by providing
  - a. the full name of the financial, investment, or banking institution,
  - b. full street address,
  - c. website,
  - d. account number,
  - e. full name of each person having a legal or equitable interest in the account,
  - f. and the current balance of the account.
2. Identify each and every legal or equitable interest Redbird Business Group LLC owns in any business, company, corporation, limited liability company, partnership, trust, or other legal entity, by providing
  - a. the full name and address of the entity,
  - b. the business in which the entity is engaged,
  - c. the nature, type, and percentage interest owned by Redbird Business Group LLC,
  - d. the name(s), address(es), and percentage interests owned by the other legal and/or equitable owner(s), and
  - e. the estimated value of the interest owned by Redbird Business Group LLC.
3. Describe each physical asset or other piece of personal property (including each piece of office equipment) that Redbird Business Group LLC owns or possesses with a purchase price or a current value exceeding \$1,000 and identify each asset's current physical location.
4. Identify each and every interest in any oil and gas asset owned by Redbird Business Group LLC by providing (a) the county and state in which the interest is located, (b) Redbird Business Group LLC's percentage interest in the interest, (c) the document date and title

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<sup>1</sup> In this document, Redbird Business Group LLC includes any successor entities that received any of Redbird Business Group LLC's assets or debts.

that created or transferred the interest, (d) the full recording information for the interest, if any, and (e) the current value of the interest.

5. Identify all monies received by Redbird Business Group LLC or by others for Redbird Business Group LLC's benefit since January 30, 2020 by providing (a) the date funds were received, (b) the person funds were received or transferred from, (c) the amount received, (d) the reasons the funds were sent or transferred to Redbird Business Group LLC or for Redbird Business Group LLC's benefit, (e) the current location of those funds, and (f) if spent or transferred, each and every specific use or recipient of the funds.
6. Identify each and every legal or equitable interest in real property in which Redbird Business Group LLC owns any interest by providing (a) the physical address of the property (including county and state), (b) the full legal description of the property, (c) the nature of Redbird Business Group LLC's interest, and (d) the date, grantor, grantee, and recording information from the deed or other instrument creating or assigning the interest.
7. Identify each and every person who has any sort of membership interest, shareholder interest, partnership interest, or ownership interest in Redbird Business Group LLC. Include in your answer (a) the person's name, (b) their address, and (c) their percentage of ownership.
8. Produce all tax returns for Redbird Business Group LLC from 2020 to the present.
9. Produce all documents related to any tax returns responsive to Request No. 8.
10. Produce bank or account statements from January 30, 2020, to the present for each account that Redbird Business Group LLC has with any financial, investment or banking institution of any kind in which Redbird Business Group LLC has had any legal or equitable right, title, or interest (including as beneficiary of any trust), which Redbird Business Group LLC controlled, for which it had signatory authority at any time, or into which it placed any funds.
11. Produce all documents related to any bank or account statements responsive to Request No. 10.
12. Produce each tax document showing any funds received (including any Schedule K-1 received) by Redbird Business Group LLC from 2020 to the present.
13. Produce all documents related to any tax document showing any funds received (including any Schedule K-1 received) responsive to Request No. 12.
14. Produce documents sufficient to identify all persons or entities who owe a debt or other financial obligation to Redbird Business Group LLC.
15. Produce documents related to any trust for which Redbird Business Group LLC is a beneficiary, settlor, or trustee.

16. Produce documents sufficient to show all equitable or legal interests in real property that is owned by Redbird Business Group LLC.
17. Produce documents sufficient to identify all real property owned by Redbird Business Group LLC.
18. Produce documents sufficient to show all equitable or legal interests in any business, company, corporation, limited liability company, partnership, trust, or other legal entity that is owned by Redbird Business Group LLC.
19. Produce documents sufficient to show all equitable or legal interests in any vehicle owned by Redbird Business Group LLC.
20. Produce documents and communications related to the opening or closing of any financial, investment, banking or credit accounts for Redbird Business Group LLC.
21. Produce documents and communications sufficient to show all transfers of funds made to, or the benefit if, Redbird Business Group LLC.
22. Produce documents and communications sufficient to show all transfers of funds made by, or on behalf of, Redbird Business Group LLC.
23. Produce general ledgers and balance sheets for Redbird Business Group LLC.
24. Produce income statements for Redbird Business Group LLC.
25. Produce credit card statements for any credit accounts held by Redbird Business Group LLC or for which Redbird Business Group LLC is a signatory.
26. Produce documents related to any credit card statements responsive to Request No. 25.
27. Produce documents sufficient to show all other debts or obligations owed by Redbird Business Group LLC.
28. Produce documents sufficient to show the current value of any accounts receivable held by Redbird Business Group LLC, and the identity of all persons or entities that must pay Redbird Business Group LLC under those accounts.
29. Produce documents sufficient to show any liens or assignments related to any of Redbird Business Group LLC's accounts receivable.
30. Produce all operating agreements, partnership agreements, limited liability company agreements, company agreements or other similar agreements for Redbird Business Group LLC.

31. Produce documents sufficient to show any person who has a membership interest, shareholder interest, partnership interest, or ownership interest in Redbird Business Group LLC.
32. Produce documents sufficient to show Redbird Business Group LLC's limited partners, general partners, members, shareholders, managing members, or other owners.

**CERTIFICATE OF SERVICE**

I hereby certify that on the 30th day of April 2024, electronically transmitted the foregoing document to the Clerk of the Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF Registrants:

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